



June 29, 2017

CONFIDENTIAL FILING

VIA OVERNIGHT DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

**RE: Ragland Telephone Company, Inc.'s Confidential Financial Information
Subject to Protective Order;
In re (WC Docket Nos. 14-58, 10-90).**

Dear Ms. Dortch:

In conjunction with the annual reporting requirements of 47 C.F.R. §§ 54.313 and 54.422, Ragland Telephone Company, Inc., rate of return carrier and a recipient of high cost support, respectfully submits the enclosed, marked confidential information under seal, as specified in the FCC's Protective Order of November 16, 2012 ("Protective Order") (WC Docket Nos. 14-58, 10-90), and 47 C.F.R. §§ 0.459, and requests confidential treatment of said information. Ragland Telephone Company, Inc. has electronically filed FCC Form 481 to the Commission with redacted Line 3005 financial data.

The confidential information is required by 47 C.F.R. § 54.313(f)(2) and includes detailed financial information that is competitively sensitive and would not normally be made available for public inspection. Disclosure of this information would have a substantial negative impact on Ragland Telephone Company, Inc. Pursuant to 47 C.F.R. § 0.049(b), Ragland Telephone Company provides the following information in support of its request that the confidential material enclosed herein be withheld from public inspection.

47 C.F.R. § 0.049(b)(1). Exemption 4 of the Freedom of Information Act ("FOIA") protects "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." Ragland Telephone Company, Inc. maintains this information is confidential, competitively sensitive data not normally made available to the public, which, if released, would have a substantial, negative competitive impact on Ragland Telephone Company, Inc. Each page of the non-redacted version of this filing containing confidential information is marked as "CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER."

47 C.F.R. § 049(b)(2). This information is being submitted in compliance with 47 C.F.R. § 54.313(f)(2) and is to be filed in WC Docket No. 10-90. Privately-held rate of return carriers that receive high cost support must complete the FCC Form 481, to include “[a] full and complete annual support of the company’s financial condition and operations as of the end of the preceding fiscal year.” Ragland Telephone Company, Inc. is requesting that portions of this information be afforded confidential treatment.

47 C.F.R. § 049(b)(3). The information designated as confidential is detailed financial information including a balance sheet, income statement, and cash flow statement that is competitively sensitive information not normally made available to the public, which, if released, would have a substantial, negative competitive impact on Ragland Telephone Company, Inc.

47 C.F.R. § 049(b)(4)&(5). Such financial information is generally not subject to routine public inspection under 47 C.F.R. § 0.457(d), which would subject Ragland Telephone Company, Inc. to substantial competitive harm.

47 C.F.R. § 049(b)(6)&(7). Ragland Telephone Company, Inc. has routinely treated the non-public information included in this submission as confidential and has protected it from disclosure to outside parties. Any financial information required to be submitted to state regulatory authorities has also been filed as confidential information, in accordance with state rules and/or statutes.

47 C.F.R. § 049(b)(8). Ragland Telephone Company, Inc. believes that this information should be treated as confidential for a minimum period of ten years.

As required in the Protective Order, one copy of the redacted confidential information is being filed simultaneously with the non-redacted confidential information, marked as “REDACTED – AVAILABLE FOR PUBLIC INSPECTION.” The redacted version is also being filed through the FCC’s Electronic Comment Filing System.

Questions regarding this matter should be addressed to me at 334.240.3684.

Sincerely,

Jackson Thornton


Rich Compton

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

1 of 1

<010>	Study Area Code	250316
<015>	Study Area Name	RAGLAND TEL CO
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Stephanie Jackson
<035>	Contact Telephone Number: Number of the person identified in data line <030>	2054722141 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	stephaniejackson@ragland.net
Form Type		54.313 and 54.422

**(200) Service Outage Reporting (Voice)
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	250316
<015>	Study Area Name	RAGLAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Jackson
<035>	Contact Telephone Number - Number of person identified in data line <030>	2054722141 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephaniejackson@ragland.net

<210> For the prior calendar year, were there any reportable voice service outages?

$\langle 220 \rangle$	$\langle a \rangle$	$\langle b1 \rangle$	$\langle b2 \rangle$	$\langle b3 \rangle$	$\langle b4 \rangle$	$\langle c1 \rangle$	$\langle c2 \rangle$
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[illegible]

**(300) Unfulfilled Service Request
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	250316
<015>	Study Area Name	RAGLAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Jackson
<035>	Contact Telephone Number - Number of person identified in data line <030>	2054722141 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephaniejackson@ragland.net

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

Contact Name - Person USAC should contact regarding this data

Stephanie Jackson

Contact Telephone Number - Number of person identified in data line

030> 2054722141 ext.

Contact Email Address - Email Address of person identified in data line

stephaniejackson@ragland.net

030>

Select from the drop-down list to indicate how you would like to report
voice complaints (zero or greater) for voice telephony service in the prior
calendar year for each service area in which you are designated an ETC for
any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice

Complaints per 1000 customers for fixed voice 0 . 0

Complaints per 1000 customers for mobile voice

Select from the drop-down list to indicate how you would like to report
end-user customer complaints (zero or greater) for broadband service in
the prior calendar year for each service area in which you are designated
an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband

Complaints per 1000 customers for fixed broadband 0 . 0

Complaints per 1000 customers for mobile broadband

in compliance with applicable minimum service standards

**(710) Broadband Price Offerings
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	250316
<015>	Study Area Name	RAGLAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Jackson
<035>	Contact Telephone Number - Number of person identified in data line <030>	2054722141 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephaniejackson@raqland.net

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

FCE Form 481
OMB Control No. 3060-0845/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	250316
<015>	Study Area Name	RAGLAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Jackson
<035>	Contact Telephone Number - Number of person identified in data line <030>	2054722141 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephaniejackson@ragland.net

<900> Does the filing entity offer tribal land services? (Y/N)

No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

(1000) Voice and Broadband Service Rate Comparability**Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	250316
<015>	Study Area Name	RAGLAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Jackson
<035>	Contact Telephone Number - Number of person identified in data line <030>	2054722141 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephaniejackson@ragland.net

<1000> Voice services rate comparability certification

Yes

250316a11010.pdf

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1020> Broadband comparability certification

250316a11030.pdf

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	250316
<015>	Study Area Name	RAGLAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Jackson
<035>	Contact Telephone Number - Number of person identified in data line <030>	2054722141 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephaniejackson@ragland.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	250316
<015>	Study Area Name	RAGLAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Jackson
<035>	Contact Telephone Number - Number of person identified in data line <030>	2054722141 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephaniejackson@ragland.net

250316a11210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

http://www.ragland.net/docs/Lifeline_Online_Disclosures_for_Ragland.pdf

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:



<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,



<1222> Details on the number of minutes provided as part of the plan,



<1223> Additional charges for toll calls, and rates for each such plan.

(2005) Price Cap Carrier Additional Documentation**Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<010>	Study Area Code	250316
<015>	Study Area Name	RAGLAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Jackson
<035>	Contact Telephone Number - Number of person identified in data line <030>	2054722141 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephaniejackson@ragland.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.

<2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.

<2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.

<2024A> Round 2 Recipient of Incremental Support?

<2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.

<2025A> Round 2 Recipient of Incremental Support?

<2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).

<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the document is accurate.

Progress Report on 5 Year Plan

Carrier certifies to 54.313(f)(1)(iii)

Yes - Attach Certification

Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}

Please Provide Attachment

Name of Attached Document Listing Required Information

250316a13010.pdf

Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}

Please Provide Attachment

No - No New Community Anchors

Name of Attached Document Listing Required Information

Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}

(Yes/No)

☒ ☐

If yes, does your company file the RUS annual report

(Yes/No)

☒ ☐

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☒

Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

☒

If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

Ragland 2016 479.pdf

If the response is no on line 3014, is your company audited?

(Yes/No)

☐ ☐

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.

☐

If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

☐

Underlying information subjected to a review by an independent certified public accountant

☐

Underlying information subjected to an officer certification.

☐

(3005) Area Of Return Carries Additional Documentation (Continued)

FCC Form 487
OMB Control No: 3060-0886/OMB Control No: 3060-0819
JULY 2013

Area Collection Form

<010>	Study Area Code	250316
<015>	Study Area Name	RAGLAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Jackson
<035>	Contact Telephone Number - Number of person identified in data line <030>	2054722141 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephanie.jackson@ragland.net

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

REDACTED - AVAILABLE FOR PUBLIC INSPECTION

broadband Experiment

Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

Participant certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas.

Anchor Institutions – FCC 14-98 (paragraph 79)

Participants must provide the number, names, and addresses of community anchor institutions to which they have newly deployed broadband service in the preceding calendar year. On this line, please respond with "yes" for new community anchors, "no" for no new anchors to indicate whether this list will be provided.

Line 4003A, please provide a response for 4003B.

Provide the number, names and addresses of community anchor institutions to which the participant has newly begun providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	_____
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Deployment Locations – FCC 14-98 (paragraph 80)

Provide a list of geocoded locations to which broadband has been deployed as of the date immediately preceding the July 1st filing of the FCC Form 481.	Name of Attached Document Listing Required Information	_____
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Provide evidence demonstrating that the participant is meeting the relevant public service obligations for the identified locations. Materials must detail the pricing, offered broadband service, and data usage allowances available in the geographic area.	Name of Attached Document Listing Required Information	_____
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**Certification - Reporting Carrier
Data Collection Form**
FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	250316
<015>	Study Area Name	RAGLAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Jackson
<035>	Contact Telephone Number - Number of person identified in data line <030>	2054722141 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephaniejackson@ragland.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	250316
<015> Study Area Name	RAGLAND TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Stephanie Jackson
<035> Contact Telephone Number - Number of person identified in data line <030>	2054722141 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	stephaniejackson@ragland.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Jackson Thornton</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	Jackson Thornton
Name of Reporting Carrier:	RAGLAND TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/29/2017
Printed name of Authorized Officer:	Stephanie Jackson
Title or position of Authorized Officer:	Vice President
Telephone number of Authorized Officer:	2054722141 ext.
Study Area Code of Reporting Carrier:	250316 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	RAGLAND TEL CO
Name of Authorized Agent Firm:	Jackson Thornton
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/29/2017
Name of Authorized Agent Employee:	Rich Compton
Title or position of Authorized Agent or Employee of Agent	Senior Manager
Telephone number of Authorized Agent or Employee of Agent:	3342403684 ext.
Study Area Code of Reporting Carrier:	250316 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

250316

RAGLAND TEL CO

2018

Stephanie Jackson

2054722141 ext.

stephaniejackson@ragland.net

1/1/2017

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	250316
<015>	Study Area Name	RAGLAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Jackson
<035>	Contact Telephone Number - Number of person identified in data line <030>	2054722141 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephaniejackson@ragland.net

[illegible]

Response to Line 510

Pursuant to 47 C.F.R. § 54.313(a)(5) and 47 C.F.R. § 54.422(b)(3), Ragland Telephone Co., Inc. certifies that it is in compliance with applicable service quality standards and consumer protection rules, including those rules governing the treatment of Customer Proprietary Network Information ("CPNI") and the Red Flag rules. Ragland Telephone Co., Inc. provides Red Flag and CPNI training to all new employees and conducts annual reviews regarding Red Flag and CPNI procedures for all existing employees. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand their obligations regarding adherence to these rules. Ragland Telephone Co., Inc. has posted information regarding CPNI on its website and requires all subscribers to complete an authorization form and obtain a password for disclosure of customer account information.

Response to Line 610

47 CFR 54.202(a)(2) provides that, to be designated as an ETC, a carrier must demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

Functionality in Emergency Situations:

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4), as set forth in 47 C.F.R. § 54.202(a)(2), Ragland Telephone Co., Inc. meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to Ragland Telephone Co., Inc.'s central office by a diesel generator with fuel to run for over 30 days and battery plant capable of powering the central office for over 8 hours. Ragland Telephone Co., Inc.'s remote offices and field gear have emergency stand-alone capabilities that allow for customers to continue to receive dial tone during any emergency outages. Ragland Telephone Co., Inc. also has redundancy technology (such as SONET and ringed IP transport) deployed in its network and further has the capabilities to reroute traffic should its facilities become damaged. Ragland Telephone Co., Inc. is prepared and capable of managing traffic spikes resulting from emergency situations. Ragland Telephone Co., Inc. has developed internal emergency procedures to properly respond to emergency situations as they arise.

Ragland Telephone Co., Inc. (SAC – 250316)
Demonstration of Complying with Voice Services Comparability

Ragland Telephone Company hereby certifies that its fixed voice service is no more than two standard deviations above the national average urban rate for voice service, as published annually by the Wireline Competition Bureau, as required in 47 C.F.R. § 54.313(a)(10). The Company has a fixed voice service rate of \$18.00 which is far less than the national average monthly rate of \$49.51.

Ragland Telephone Company, Inc. (SAC – 250316)
Demonstration of Complying with Broad Services Comparability

Ragland Telephone Company hereby certifies that its broadband service is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau, as required in 47 C.F.R. § 54.313(a)(12). The Company offers a broadband service with 10/1 speed and unlimited use at a rate of \$69.95, which is less than the benchmark rate of \$77.98 for the same speed as determined by the FCC's reasonable comparability benchmark calculator.

LIFELINE ASSISTANCE

What Is Lifeline Assistance?

- Lifeline Assistance is a government assistance program that provides a monthly credit to the local telephone service bill of residential customers. Lifeline Assistance is designed to make basic home telephone service even more affordable for qualified customers.
- If you qualify for Lifeline Assistance, Ragland Telephone Company will discount your local telephone charge by \$12.75 each month.

What Restrictions Apply to the Lifeline Program?

- Lifeline customers may subscribe to any local telephone service plans offered by Ragland Telephone Company, but the discount may only be applied to local telephone charges.
- **Lifeline Assistance is a federal benefit – willfully making false statements in order to receive government assistance can result in a fine or imprisonment or cause the subscriber to be de-enrolled or barred from the program.**
- Lifeline Assistance is only available for one telephone or wireless (cellular) line per household, which is used as the primary residential line.
- For purposes of the Lifeline program, a “household” is defined as any individual or group of individuals who live together at the same address and share in the household’s income and expenses. A household may include related and unrelated persons.
- The household may not receive Lifeline benefits from more than one service provider – that is, if someone in the household receives a Lifeline discount on wireless (cellular) service, the household would not also qualify to receive a discount on home phone service.
- Violation of this “one-per-household” rule is a violation of the rules of the Federal Communications Commission (“FCC”) and will result in the subscriber’s de-enrollment from the Lifeline Assistance program and possible prosecution by the United States Government.
- Lifeline Assistance is also a non-transferable benefit – it is a violation of federal law to rent, sell or give away your Lifeline service to any other individual.

How Do I Qualify for Lifeline Assistance?

Lifeline Assistance is available to residential telephone customers who have an annual household income at or below 135% of the Federal Poverty Guidelines for a household of its size **OR** who participate in any of the following low-income assistance programs:

- ❖ Medicaid
- ❖ Supplemental Nutrition Assistance Program (SNAP or Food Stamps)
- ❖ Supplemental Security Income (SSI)
- ❖ Section 8 Federal Public Housing Assistance (FPHA)
- ❖ Low Income Home Energy Assistance Program (LIHEAP)
- ❖ Temporary Assistance for Needy Families (TANF)
- ❖ National School Lunch Program’s Free Lunch Program (NSLP)

You may also be eligible for Lifeline Assistance even if you do not personally participate in one of these programs, as long as an individual who lives in your household, and for whom you are financially responsible, participates in at least one of these programs.

What Proof of Eligibility Do I Need to Provide?

Qualifying Based on Annual Household Income

If you want to qualify for Lifeline Assistance based on your annual household income, your household income must be at or below 135% of the Federal Poverty Guidelines for a household of that size.

Annual Income 135% Thresholds Based on Household Size								
1 person	2 people	3 people	4 people	5 people	6 people	7 people	8 people	For each additional person
\$15,080	\$20,426	\$25,727	\$31,118	\$36,464	\$41,810	\$47,156	\$52,502	+ \$5,346 per person

You must provide proof of your household income at the time that you apply for Lifeline Assistance through one or more of the following:

- Most recent state or federal tax return
- Retirement/pension statement of benefits
- Current income statement from an employer
- Unemployment/Workmen's Compensation Statement of Benefits
- Paycheck stubs for most recent 3 months
- Federal notice letter of participation in General Assistance
- Social Security Statement of Benefits
- Veterans Administration Statement of Benefits
- Child Support document
- Divorce decree
- Other official document containing income information for at least 3 months time

Qualifying Based on Participation in Low-Income Assistance Programs

If you want to qualify for Lifeline Assistance based on participation in one of the low-income assistance programs, you must provide proof of participation at the time that you apply for Lifeline Assistance with one or more of the following:

- Current or prior year's statement of benefits from a qualifying state or federal program
- A notice letter of participation in a qualifying state or federal program
- Program participation documents, such as a copy of your SNAP card, Medicaid card, etc.
- Other official document evidencing the qualifying person's participation in one of the listed state or federal low-income assistance programs

Ragland Telephone Company will NOT keep a copy of any of the supporting documentation you provide.

Frequently Asked Lifeline Questions

Q. Can Ragland accept a copy of my paycheck as proof of my income eligibility for Lifeline Assistance?

A. The FCC rules require copies of your paycheck stubs for 3 consecutive months as proof of your income-based eligibility for Lifeline Assistance. A copy of your paycheck is not acceptable.

Q. If I babysit or am self-employed, what is acceptable proof of my income?

A. You may provide a copy of your most recent income tax return as proof of your income.

Q. How can I get a copy of my Social Security Statement of Benefits, as acceptable proof of my income?

A. The Social Security Statement of Benefits is mailed to all recipients annually. You may obtain another copy from your local Social Security office. You should be aware that Supplemental Social Security ("SSI") is not the same as Social Security – SSI is a federal income supplement program for blind and disabled people with little or no income and is not funded by Social Security taxes.

Q. Can I qualify for Lifeline Assistance based on my age?

A. Lifeline Assistance is not awarded based on age. To qualify, you must meet the income guidelines or participate in one of the qualifying low-income assistance programs.

Q. Do I qualify for Lifeline Assistance if I receive Medicare?

A. No. Medicare is not one of the qualifying programs for Lifeline Assistance.

Q. I have recently moved to the area and need telephone service, but I only have a temporary address. Can I apply for Lifeline Assistance?

A. You must provide a permanent residential address and a billing address, if different from the residential address, before you can receive Lifeline Assistance. If you do not have a permanent address (e.g., an address not recognized by the Post Office or a temporary living situation), you must provide a temporary residential service address or other address identifying information. Ragland Telephone Company is required to verify your temporary address every 90 days, until you obtain a permanent address. If you do not respond to Ragland's address verification attempts within 30 days, you may be de-enrolled from Lifeline service.

Q. Can I use a Post Office Box for my address?

A. Ragland can accept a P.O. Box or General Delivery address as your billing address, but not as a residential address.

Q. What must I do if my address changes?

A. If you move to a new address, you must provide your new address to Ragland Telephone Company within 30 days after relocating.

Q. Am I required to notify you of any changes in my income or participation in one of the low-income assistance programs?

A. You must notify Ragland Telephone Company within 30 days if you or the qualifying person in your household no longer participates in the government assistance program(s) that qualify you for Lifeline Assistance; if your qualifying annual household income exceeds 135% of the Federal Poverty Guidelines; or if you no longer qualify to receive Lifeline Assistance for any other reason. You will then stop receiving Lifeline benefits.

Q. Do I need to provide a deposit when I apply for Lifeline Assistance?

A. Customers who do not subscribe to Toll Limitation Service at the time of signing up for Lifeline Assistance may be required to provide a service deposit, consistent with the terms of Ragland Telephone Company's General Subscriber Services Tariff. Ragland offers free Toll Limitation Service to Lifeline customers for any local service plan that charges a fee for toll calls that is in addition to the monthly price of your Lifeline service.

Q. When will the Lifeline discount be included on my telephone bill?

A. The discount will be applied to your account within two billing cycles and will be retroactive back to your approval date.

Q. Why isn't the Lifeline discount still appearing on my bill?

A. The FCC now requires Ragland Telephone Company to verify its Lifeline customers' continuing eligibility for Lifeline Assistance every year. If you did not complete and return the Lifeline Rate Assistance Verification form sent to you by Ragland within 30 days, as required, your Lifeline Assistance was terminated. You must re-apply for Lifeline Assistance in order to receive the discount.

Q. Who can I call if I have questions about Lifeline Assistance?

A. You may call Ragland's customer service representatives at 205-472-2141 between the hours of 8:00 a.m. and 4:00 p.m., Monday through Friday. You may also contact the Alabama Public Service Commission at 1-800-882-3919 or visit the following websites: www.psc.state.al.us or www.usac.org.

How Do I Apply for Lifeline Assistance?

- You may apply in person for Lifeline Assistance at Ragland Telephone Company's business office, located at 630 Main Street in Ragland, Alabama, between the hours of 8:00 a.m. and 4:00 p.m., Monday through Friday.
- You must complete the Lifeline application form and bring proof of your eligibility for Lifeline Assistance based on either your household income or participation in one of the qualifying low-income assistance programs.
- If you have questions about Lifeline Assistance, you may call Ragland's customer service representatives at 205-472-2141 during normal business hours.

**Ragland Telephone (SAC – 250316) Milestone
Certification**

As required in 47 C.F.R. § 54.313(f)(1)(i), Ragland Telephone hereby certifies that it has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity, that is reasonably comparable to reasonably comparable offerings in urban areas, and that requests for such service would be met within a reasonable amount of time.

Ragland Telephone Company

USDA-RUS

Operating Report For Telecommunications Borrowers
Period Ending 2016

Part A – Balance Sheet

REDACTED – AVAILABLE FOR PUBLIC INSPECTION

Ragland Telephone Company

USDA-RUS

Operating Report For Telecommunications Borrowers

Period Ending 2016

Part B – Statement of Income and Retained Earnings or Margins

REDACTED – AVAILABLE FOR PUBLIC INSPECTION

Ragland Telephone Company

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Operating Report For Telecommunications Borrowers
Period Ending 2016

Part C – Subscriber (Access Line), Route Mile, & High Speed Data Information

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Ragland Telephone Company

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Operating Report For Telecommunications Borrowers
Period Ending 2016

Part C – Subscriber (Access Line), Route Mile, & High Speed Data Information
Broadband Service

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Ragland Telephone Company

USDA-RUS

Operating Report For Telecommunications Borrowers
Period Ending 2016

Part D – System Data

Part E – Toll Data

Part F – Funds Invested In Plant During Year

Part G – Investments in Affiliated Companies

REDACTED – AVAILABLE FOR PUBLIC INSPECTION

Ragland Telephone Company
USDA-RUS
Operating Report For Telecommunications Borrowers
Period Ending 2016

Part H – Current Depreciation Rates

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Operating Report For Telecommunications Borrowers
Period Ending 2016

Part I – Statement of Cash Flows

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Ragland Telephone Company

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Operating Report For Telecommunications Borrowers
Period Ending 2016

Notes To The Operating Report For Telecommunications Borrowers

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Ragland Telephone Company

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Operating Report For Telecommunications Borrowers
Period Ending 2016

Certification Loan Default Notes To The Operating Report For
Telecommunication Borrowers

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